

D-AFS-K65186-NV



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

75 Hawthorne Street
San Francisco, CA 94105

August 1, 1996

Jerry Ingersoll
Planning Team Leader
USDA Forest Service
Spring Mountains National Recreation Area
Planning Team
2881 S. Valley View Blvd., Suite 16
Las Vegas, NV. 89102

Dear Mr. Ingersoll:

The Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the project entitled **Spring Mountains National Recreation Area General Management Plan, Toiyabe National Forest, NV.** Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The Forest Service proposes to amend the Forest Plan for the Toiyabe National Forest to establish management direction for the Spring Mountains National Recreation Area, as called for by the Spring Mountains National Recreation Area Act (P.L. 103-63). Twelve alternative approaches to management are evaluated ranging from no action, maximum focus on threatened and endangered species and sensitive resources (Alternative B), maximum recreation and public use (Alternative C), to maximum consideration of local community needs (Alternative H). Alternative M is the preferred alternative. This alternative resulted from stakeholder input and considers biological and natural process concerns as well as public needs. The focus is on increasing both protection of rare species and public access. Key components consist of buffer zones and biodiversity hotspots, reduction of the wild horse populations, management of overnight camping in the Wilderness under a permit system, new recreation development to decrease potential over-use of sensitive areas, and flexible management of public use such as rock climbing and summer homes.

We commend the Forest Service for the efforts made to understand and address public concerns and all major issues. This proactive approach should be continued as the EIS progresses. We support the balanced moderate approach provided in the preferred alternative, Alternative M. Nevertheless, we have some concerns regarding the intensity of use and development allowed in potentially sensitive areas, potential effects on groundwater, and the enforceability and funding for the proposed increased management and oversight.

Because of the above concerns, EPA has classified this DEIS as category EC-2, Environmental Concerns - Insufficient Information (see attached "Summary of the EPA Rating

System"). We appreciate the opportunity to review this DEIS. Please send one copy of the Final EIS to this office at the same time it is officially filed with our Washington, D.C. office. If you have questions, please call me at (415) 744-1584, or invite your staff to call Ms. Laura Fujii at (415) 744-1579.

Sincerely,



David J. Farrel, Chief
Office of Federal Activities

Enclosure: (3 pages)

Filename: Springmt.dei
MI002433

cc: BLM, Stateline Resource Area
BLM, Red Rock Canyon NCA
NPS, Lake Mead NRA
USFWS, Reno
Clark County Planning Dept.

SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION

Environmental Impact of the Action

LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommend for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1-Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From: EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

COMMENTS

Biological Environment

1. Alternative M, the preferred alternative, would allow new water developments anywhere to improve native wildlife species habitat or to improve distribution of non-native species (e.g., horses, elk) across a habitat (pg. III-31). While we concur with the benefit of redistributing wildlife and non-native species out of over-used areas, we remain concerned with the potential risk to existing native plant and animal species. In particular, the introduction of disease and weeds from non-native species and increased competition for scarce resources are of concern. We recommend the Forest Service consider a tiered management criteria where new water developments for species redistribution be utilized as a last resort. Clear and specific guidelines and standards for water development should be developed. In addition, we urge an emphasis on the decrease and control of non-native populations in lieu of redistribution to currently unused locations.
2. Limited new recreation development would be allowed in upper Kyle and Lee Canyons under Alternative M (pg. III-31). In addition, two festivals (e.g., music concerts) per month with a maximum of 2500 people per event would be allowed at the Las Vegas Ski and Snowboard Resort in Lee Canyon. Although, a condition of new development would be the avoidance or mitigation for impacts to species of concern and sensitive species, we remain concerned with the proposed level of use and development. The DEIS clearly shows significant biodiversity hotspots in Kyle and Lee Canyons and the need for buffer zones. In addition, these Canyons are already heavily used, thus the proposed activity would place these sensitive resources at even greater risk of disturbance, encroachment, fragmentation, and exotic species introductions. We urge strict and clear criteria for future development and special events, siting decisions based upon sound science and field data, monitoring, and adoption of an adaptive management approach. We believe this conservative approach is even more critical given the uncertainty of mitigation success and the potential for cumulative impacts.
3. Motorized use on designated roads and trails would be allowed in Alternative M. While we recognize the need for public access, we question the ability to minimize impacts to sensitive resources which could occur with motorized trail use. Permitting motorized trail use could increase the occurrence of accidental and intentional off-trail use. Given the decreasing level of resources and staff available to enforce use restrictions, there is a greater chance for significant damage to sensitive species and resources. We urge the Forest Service to reconsider their policy regarding motorized trail use. Another option is to implement very strict guidelines for the designation of trails for motorized use to ensure such use has limited access to resources of concern.

Groundwater

Although groundwater resources and their protection are discussed in the document, the DEIS does not clearly indicate if there is groundwater contamination in the Spring Mountains National Recreation Area (SMNRA) at existing facilities. Likewise, the document does not identify remedial measures for groundwater contamination, if it currently exists.

Additional clarification on this issue should be provided in the FEIS.

General Comments

1. We strongly encourage the Forest Service to adopt a policy prohibiting Wilderness campfires. We believe the benefits gained from such a policy outweigh the inconvenience of requiring camp stoves. In addition, camping equipment is sufficiently technically developed to ensure many options for light weight camp stoves that minimize the inconvenience of packing this equipment into the Wilderness. A policy prohibiting campfires in Wilderness would ensure protection of the unique and sensitive Bristlecone pine resource, prevent unsightly fire rings, minimize the adverse impacts to other high elevation and alpine species from excessive wood gathering, and reduce the number of accidental fires. The reduction of accidental fires in the Wilderness area would further increase fire protection for local communities and would reduce fire suppression costs.
2. We are concerned with the proposal for up to 40 acre green firewood harvests on the westside of the range. Depending on the proposed harvest prescription, this level of harvest could have significant adverse impacts to sensitive habitats, sedimentation and erosion rates, and visual resources. We recommend the FEIS describe in more detail the existing conditions, such as the existing canopy coverage, and discuss the types of prescriptions which will be allowed. We advocate smaller openings, thinning, or shelter cuts instead of larger clearcuts.
3. The Forest Service acknowledges the possibility for a limited budget due to downsizing and reorganization. Given this probable reduction in resources, we recommend the FEIS include a list which prioritizes the proposed management actions and projects. The prioritization of activities is not clear in the DEIS. If possible, include a tentative schedule for when specific actions may be implemented. The method and rationale for the prioritization should also be provided.
4. Construction of low-standard recreation facilities (e.g., comfort stations, parking areas) would be allowed in the 50 year floodplain, where no other options are practical. The DEIS clearly states that intense thunderstorms or rainfall on snowpack often produce large flash floods. However, the DEIS does not discuss whether there is an existing or future risk of excess sewage or oil contamination from washed out facilities. The FEIS should discuss the implications and potential pollution impacts from proposed facilities and activities within the floodplain.
5. Chapter 2 of the DEIS lists the concerns and issues voiced by the public during scoping and preliminary planning meetings. We recommend the FEIS integrate into this list a short response to each of these concerns. This response should state how the comment has been addressed by the preferred alternative and proposed management actions. Another option would be to provide a reference for where the response may be found in the DEIS.

